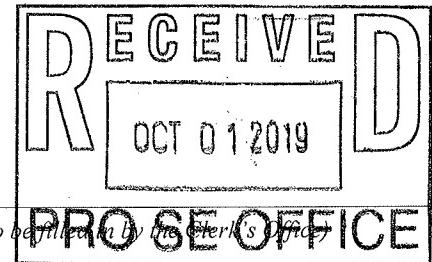


UNITED STATES DISTRICT COURT

for the

Southern District of New York

Division _____

Kareen Omar Jones

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v- The city of New York
 Gielphin Gomez, Anthony Peters, Bridget Brennan
 Angie Moretti, Brandon Young, Angie Gordoy,
Lauren Stoia, Ricky Ghosh, Gene Conway, Brian Pogg

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No. _____
 (to be filled in by the Clerk's Office)Jury Trial: (check one) Yes No

19 CV 9126

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Kareen Jones

Street Address

P.O. Box 2000

City and County

Pine City New York

State and Zip Code

New York 14871-2000

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

Gelphin Gomez
 Police Officer
 Housing PSA 4
 New York, New York
 N.Y. 10009

Defendant No. 2

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

Anthony Peters
 Sgt.
 Housing PSA 4
 New York New York
 N.Y. 10009

Defendant No. 3

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

Bridget Brennan
 Special Assistant District Attorney
 80 centre street
 New York New York
 N.Y. 10013

Defendant No. 4

Name
 Job or Title (*if known*)
 Street Address
 City and County
 State and Zip Code
 Telephone Number
 E-mail Address (*if known*)

Angie Morelli
 Assistant District Attorney
 80 centre street
 New York New York
 N.Y. 10013

See Attach

Defendant No. 5

Angie Godoy
Assistant District Attorney
80 centre street
New York New York
N.Y. 10013

Defendant No. 9

Gene Conway
Attorney
111 John street
New York New York
N.Y. 10038

Defendant No. 6

Brandon Young
Assistant District Attorney
80 centre street
New York New York
N.Y. 10013

Defendant No. 10

Blair Fogg
President
199 Water Street
New York New York
N.Y. 10038

Defendant No. 7

Lauren Stoia
Assistant District Attorney
80 centre street
New York New York
N.Y. 10013

Defendant No. 11

Cyrus Vance
One Hogan Place
New York New York
N.Y. 10013

Defendant No. 8

Ricky Ghosh
Attorney
49 Thomas Street
New York New York
N.Y. 10013

Kareem Jones

Statement of Claim

9/25/19

I Kareem Jones bring this action under 42 U.S.C. § 1983 and state law claiming that the stop, search/seizure, arrest/imprisonment, and prosecution were all unlawful. Officer Gomez and Sgt. Peters stopped Jones based on his race and without justification and, without protecting. Failure to protect, arrested Kareem Jones without probable cause. That the (ADA) Bridget Brennan Assistant, Bridget Brennan, District Attorney maliciously prosecuted Kareem Jones and conspired with the Officers of the New York City police to fabricate evidence against him. Kareem Jones, the city of New York (the city) failed to properly train and discipline its officers with respect to executing its stop and Frisk policy and that the City and District Attorney Cyrus Vance (DA Vance) Failed to properly train and discipline local prosecutors. New York City (the city) failed to provide effective assistance of counsel with respect to the U.S. Const. Amend. VI. (the city) Failed to properly train and discipline local attorney, Blain Fogg and Ricky Ghosh Genz Conway, and Prosecutors, Angie Morrelli, Angie Today, Lauren Stoia, Brandon Young.

R. Jones

September 25th 2019

Kareem Jones seeks compensatory and punitive damages and his liberty

Statement of Claim

Kareem Jones: First Claim: Issue

September 25th 2019

On July 2nd 2016 Kareem Jones was stopped by Newyork police department (NYPD) officer Gelpin Gomez and Sgt. Anthony Peters inside of the Parking lot of Gompers Houses in lower Manhattan. Where Kareem Jones was a guest, to pick up his girl friend from work, a Gompers Houses employee, despite being a guest and following the rules... Officer Gomez and Sgt Peters unreasonably and unlawfully stopped Kareem Jones ^{detained him} without probable cause and without justification based on his race in Violation of and deprived him of his U.S. const. fourth Amend. The officers pulled up, behind Kareem Jones, in a newyork city police vehicle three feet behind Mr. Jones with their turret lights abroad and ordered Kareem Jones to place the car in park and two roll all the windows down over the loud speaker in their vehicle. The officers called for back up over the radio, the officers were outside of the parking lot and followed Kareem Jones into the parking lot as he passed by their vehicle, at the time of the stop Kareem Jones had not violated any laws was not doing anything suspicious or illegal and had no contraband in plain view. As the two officers approach Kareem Jones and the vehicle Officer Gomez leaned over the window, reached over and looked down in the inside of the driver side door, that was down and saw three bags of marijuana inside of the inside door panel. Officer Gomez opened the car door and told Kareem Jones to step out and Officer Gomez escorted Kareem Jones to the back of the vehicle at the trunk and told him to place his hands on the trunk and searched him. Officer Gomez and Sgt. Peters focused on Jones because he is African American.

and unlawfully as well as unconstitutionally violated Kareem Jones United States constitutional right under the fourth Amendment. However after taking Kareem Jones to trunk and placing his hands on the trunk officer Oonee picked up a bag of white substance off the floor, with Kareem Jones in his view at all times and states this bag is yours. Kareem Jones was arrested and taken to the NYPD police department where he was stripped search and the vehicle was searched recovering roach clips of marijuana and a scale. Jones was taken to arraignment. Deprived of his constitutional right false arrest.

Second claim: I sue

On July 3rd 2016 Attorney Ricky Ghosh of the legal aid society presented written notice to the people ADA requesting that Kareem Jones testify before the grand Jury 180.80 on July 8th 2016. Kareem Jones had spoke to Ricky Ghosh and was told that he will testify. On July 8th 2016 at a counsel visit, Ricky Ghosh told Kareem Jones "that he hopes the day goes by fast he has a huge case load and that he is going on vacation for two weeks, located in the court building. Ricky Ghosh was extremely frustrated from the amount of cases that he had while speaking with Kareem Jones. Kareem Jones was not aware of a break down with communication or that he would be deprived of his Right to testify. Ricky Ghosh deprived Kareem Jones of his U.S. Constitutional right under the sixth Amendment VI, the right to effective assistance of counsel, for his conduct after the grand Jury's vote between July 8th and July 16th 2016 the date when the indictment was filed. Deprived Kareem Jones of a meaningful post vote representation. Which conduct was the resulting harm that Jones knew of February 27th 2017. Had Kareem Jones testified, had the grand Jury heard Kareem Jones they may have voted to not indict. At trial the Jury reached a not guilty verdict on four counts.

Case 1.

-Third

would be against Karen Jones interests. On February 27th 2017 Karen Jones knows of Nathan the all impermissible conduct and it harm by being being accused of four count out of six and knowing that had he been present at that critical stage ~~earlier~~ meaningfully. Had the grand jury heard Karen Jones testimony they may have voted to not indict him. On February 8th at the hearing Karen Jones had reason to know that he would not be able to testify because trial is going to be started after this hearing. The city of New York the city failed to properly train and discipline its police of giving effective assistance of counsel with respect to executing ^{its Policy} ^{of meaningful representation} U.S. const Amend VI guaranteed ^{every citizen} ~~any offense~~ The city and V Fogg failed to properly train and discipline local counsel of the legal aid center and most On February 8th 2017 Justice Sonberg relying on the testimony of Officer Grace sustained the stop ^{that happened}. When Jones was unaware that the officers would justify the stop based on a claim of double parking. Jones had suffered an injury as a result of the officers bogus claim of double parking. Sonberg's ruling at the hearing was obvious source of harm to Jones as this evidence all but established his guilt on the ^{Justice} ^{or about} ^{what} possession offenses On February 8th officer Lopez fabricated all the claim of double parking on which they based the stop. Jones bases this claim as well as failure to intervene on a constitutional violation had been committed by a law enforcement official in violation of Jones fourth Amendment constitutional rights. Here Karen Jones was maliciously prosecuted there was no probable cause for commencing the proceeding the defendant commenced and continued a criminal proceeding against Karen Jones in violation of his ^{Karen} ^{its cause} fourth Amendment rights the officer only gained ^{probable cause} ^{for the} ^{fourth} ^{Amendment} ^{Violation} because Jones constitutional rights under the fourth Amendment

1.15-cv-fourth

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did not facilitate Jones' presentation to the grand jury between July 8 and July 16 the date when the indictment was filed. RIKKI Gauthie deposed Jones of a meaningful post-vote representation, which was impermissible. Contract counsel throughout was the resulting harm which Jones knew of on February 27th, 2017; Jones was advised of four counts in a six count indictment in a partial verdict on or about February 22nd or 23rd, ^{on February 27 2017}. Jones was convicted of a felony ^{in the third degree} and guilty of criminal possession of, aggregate weight, of one half ounce or more of a controlled substance. Jones was convicted to six years incarceration. ^{At that point} Tracey Karen Jones had reason to know of the impermissible conduct as the resulting harm of the accusatory instrument, his right to effective assistance of counsel RIKKI Gauthie lack of diligence from July 8 until July 16 when the indictment was filed at the accusatory instrument to exercise Jones' right to appear as a witness depriving him of his right to effective assistance of counsel. ^{comes during time of} Article VI, Article VI, his guarantee right to ^{to} effective assistance of counsel. On July 8th 2016 to July 16th 2016 RIKKI Gauthie had not produced Tracey Jones before the grand jury. Instead Counsel was also ineffective for his conduct after the grand jury's vote for Jones still be allowed to testify when the case was called at about 12:25 pm less than 30 minutes after the vote. July 8th 2016 second counsel did not oppose the court's three week adjournment at July 8th appearance, and instead encouraged it by saying he would be out of the office despite the risks that an indictment would be filed or a new grand jury might be empaneled during that time. Counsel RIKKI Gauthie did not provide "meaningful representation" because he knew the grand jury date and time and received notice, ^{After} contract counsel despite Counsel never advised Tracey Jones not to testify, or that testifying

Fifth

and in Violation of his N.Y. State constitutional right Article 12
unreasonable search and seizures. Mr Jones was evidently denied Equal
Protection based on intent to inhibit the exercise of Constitutional
rights malicious and bad faith intend to injure Karen Jones. On or about
February 16th Gene Conway deprived Karen Jones of his Us const Amend
six that a citizen is entitled to there constitutional right to effective
assistance of counsel., On February 16th 2017 counsel did not provide
additional pertinent facts that was not discovered before the
determination of the Suppression hearing and or motion. Fact that
would have materially affect or have affected the outcome. Karen
Jones had reason to know that the officer contradicted statements at
the hearing had harmed him and that counsels decision to not file
a motion that benefits the injury of Karen Jones that was not
supported by a reasonable legitimate strategy and Injured Karen
Jones Absent a reasonable strategy even a single failing at
Suppression may as it deprives the Karen Jones of a Constitutional
right. In addition officer Gomez testified inconsistently as to the
officers approach. Gene Conway deprived Karen Jones of a Constitutional
right given these pertinent facts because I inform the court
whether the police conduct at issue amounts to a seizure in violation
of Mr. Jones fourth Amend right.

Sixth Issue

(ADA) Bridget Brennan Maliciously prosecuted Karen Jones with the officers to fabricate evidence against Karen Jones

(ADA) Angel Morelli Maliciously prosecuted Karen Jones and conspired with the officers to fabricate evidence against him in violation of the Fourth Amendment and in violation of the Fourteenth Amendment

(ADA) Stoia maliciously prosecuted Karen Jones with, other (ADA) actors, with standards for the prosecution primary duty respect the constitution and legal rights all persons. On July 8th 2016 (ADA) Stoia was told by the (ADA) assigned intended to present the case. (ADA) Stoia was the ADA that had spoke with Ricky Ghosh and was aware that the offer was rejected by Ricky Ghosh and that Karen Jones will be testifying. When the assigned (ADA) could not find a way to contact Ricky Ghosh (ADA) Stoia should have been trained to request that the assigned (ADA) Request good cause extention which was the absolute cause and to respect the constitution. Karen Jones was deprived of his fourteenth U.S. Const. Amend.

Kareen Jones had reason to know of the impermissible conduct as the resulting harm, Ricky Ghosh lack of diligence to exercise Kareen Jones right to appear as a witness depriving his of his U.S. const. Amend VI Blavine V. Fogg failed to properly train and discipline local Attorney under his administration. In accordance the stop, frBK, arrest search incident to arrest and imprisonment, fabricated evidence, malicious prosecution deprived Kareen Jones of his U.S. const rights under the fourth Amend sixth Amend 14th Amend. Failure to intervene and failure to protect.



September 25th 2019

UNITED STATES DISTRICT COURT

for the

Southern District of New York

Division

Case No.

(to be filled in by the Clerk's Office)

Kareem Omar Jones

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Cyrus R. Vance Jr. -v- The City of New York
Gelphin Gomez, Anthony Peters, Bridget
Brennan, Lauren Stoia, Angie Moretti, Brandon
Young, Angie Godoy, Rikki Ghosh, Blaine V Fogg,

Defendant(s) See Attached

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Kareem Jones

Street Address

P.O. Box 2000

City and County

Pine City New York

State and Zip Code

New York 14871-2000

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 3

Name
 Job or Title (*if known*)
 Address
 County
 Telephone Number
 E-Mail Address (*if known*)

Cyrus R. Vance Jr
District Attorney
One Hogan Place
New York *N.Y.* *10013*
City *State* *Zip Code*
New York New York

Individual capacity Official capacity

Defendant No. 4

Name
 Job or Title (*if known*)
 Address
 County
 Telephone Number
 E-Mail Address (*if known*)

Bridget Brennan
Assistant District Attorney
80 Center Street
New York *N.Y.* *10013*
City *State* *Zip Code*
Panzerino *New York New York*

Individual capacity Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

- Federal officials (a *Bivens* claim)
 State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

U.S. Constitution, Fourth Amendment, Fifth Amend, Fourteenth Amend

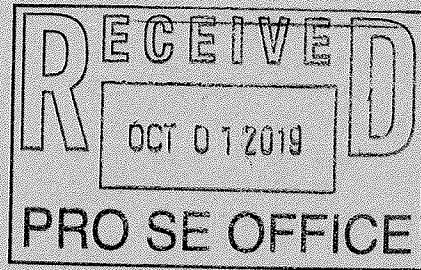
C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Southport Correctional Facility

P.O. Box 2000

Pine City, New York 14871-2000

Kareem Jones 17R0791



The logo consists of the letters "USM" in a bold, serif font, with "CDNY" stacked below it. A small "P" is positioned to the right of "USM".

(Legal Mail)

CLINICAL STUDY
2010 SEP 30 DR 4/23

U.S. District Court
Southern District of New York
U.S. Court House
500 Pearl Street
New York, New York 10007-1312

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